

Winnebago Reclamation Service, Inc.

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P.O. Box 2071
Loves Park, Illinois 61130
Office: 815/877-9561
Landfill: 815/874-7375

November 13, 1989

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REMEDIAL & ENFORCEMENT
RESPONSE BRANCH

Mr. Bernard J. Schorle
Remedial Project Manager
U.S. Environmental Protection Agency - Region V
(5HS-11)
230 South Dearborn Street
Chicago, Illinois 60604

Re: Winnebago Reclamation Landfill
(Pagel's Landfill)

Dear Mr. Schorle:

This will serve to respond to your letter of October 20, 1989, requesting that, pursuant to Section VI.F of the Administrative Consent Order for the RI/FS at the above-captioned site, the Respondents undertake certain additional work. Specifically, you requested that additional sampling wells be installed upgradient of the Winnebago Reclamation Landfill.

As you know, the locations in which you have requested those new wells are both upgradient of Winnebago Reclamation Landfill and downgradient from the Acme Solvents site. For the reasons set forth in the letter to you from Jim Hill and Gary Parker of Warzyn Engineering, Inc., dated October 24, 1989, we believe that any wells to be placed in this location, which is in the area of the plume emanating from Acme Solvents, should be done by the PRPs for that site.

Furthermore, we frankly question the need for such additional wells because, as noted in the October 24 letter, there are five wells located between the two sites which clearly show elevated levels of total ethenes thus documenting the presence of VOCs in the groundwater upgradient of the WRL site. Having documented the presence of a background source of contamination, it is the responsibility of those associated with that source to adequately define the extent and concentrations of contaminants.

Under the NCP, the purpose of a Remedial Investigation is to determine the nature and extent of the threat presented by a release and to gather sufficient information to determine the

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B. Schorle

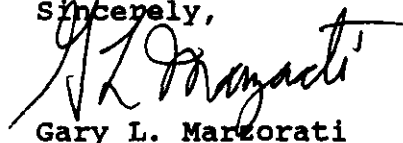
necessity for and proposed extent of remedial action. Your letter requests that the Pagel's PRP group install additional upgradient wells "to provide more complete information about the background groundwater quality." We believe that these additional wells (and the related monitoring and sampling) will not advance the purposes of the remedial investigation at Pagel's Landfill. The wells will not help determine the nature or extent of a release. Sufficient information necessary to determine the need for or extent of remedial actions at Pagel's Landfill is already available or is provided for in the current work plan.

Under these circumstances, and for the reasons more fully set forth in Warzyn's October 24 letter to you, the Respondents decline EPA's request to perform this additional work.

In the event that EPA nevertheless decides to have additional wells installed between the two sites, we believe the selection of the location of the wells and the methodology for the construction and sampling of such wells must be undertaken with great care. We all have agreed that the area upgradient of Pagel's Landfill is characterized by highly fractured geology. If additional wells are to be constructed in this area, we strongly recommend that they be located, constructed, and sampled in accordance with the recommendations which our consultants have developed. That information is enclosed herewith as Attachment A, in the hope that it will be helpful to EPA.

Meanwhile, we are proceeding forthwith to complete the interim groundwater monitoring report. In addition, we are proceeding to complete the remedial investigation consistent with the existing scope of work and Work Plan adopted under the Administrative Consent Order, and we will proceed with the Endangerment Assessment and Feasibility Study consistent with that same scope of work. Please let me know if you have any questions of the foregoing.

Sincerely,



Gary L. Marzorati

cc: Jim Hill
John Holmstrom III
Ridgway Hall
Curt Worden
Tom Tullock
Thomas D. Lupo
John Roseberg

on 11/22/89 copies to: K. Street, A. Hulten, S. Kaiser,
R. Kay, T. Hahne



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Environmental Services
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Water Resources
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Special Structures
Geotechnical Analysis

November 15, 1989
13160.52

Mr. Gary L. Marzorati
Winnebago Reclamation
4920 Forest Hills Road
Loves Park, Illinois 61111

RE: Review of EPA Directive for Additional Wells
Winnebago Reclamation Landfill (Pagel's Landfill)
Remedial Investigation

Dear Mr. Marzorati:

At the direction of the Pagel's Landfill Steering Committee we have reviewed EPA's recommendation of October 20, 1989 regarding the installation of additional monitoring wells between the WRL and Acme Solvents sites. Although we believe that the presence of background contamination has been adequately established and thus the installation of upgradient wells is not the responsibility of the Pagel's PRP group, such wells may be installed by the Acme Solvents PRP group or by U.S. EPA to better define the downgradient extent of contamination from the Acme Solvents site.

Nevertheless, because of the complex hydrogeologic conditions (fracture flow) at the site, we are concerned that the casual placement and construction of any such wells in the noted area will not provide additional meaningful data on background groundwater quality downgradient of the Acme Solvents site. For the development of additional wells to provide meaningful information on the potential for contamination being transported in fracture zones and to provide more complete information about the groundwater quality, a specifically defined approach to well placement, testing, and completion must be followed. If additional wells are to be installed, the approach as outlined below is recommended.

Well construction should follow a sequenced approach where the information from one step would be used to define the next step. Basic steps would include:

- drilling through the unconsolidated materials (set casing to maintain open hole) and into the dolomite bedrock to the water table,
- continuously coring through the saturated bedrock to a predetermined elevation to identify fractured zones (target elevation of 620 feet MSL recommended),

Attachment A

Warzyn Engineering Inc.
2100 Corporate Drive
Addison, Illinois 60101
(708) 691-5000
FAX 691-5133

- thoroughly purging the borehole by pumping formation water from varying depths within the boring,
- isolating and collecting (triplicate) groundwater samples at 10-foot intervals of the borehole from the water table to bottom of hole with a double packer system (medical grade nitrogen should be used for packer pressurization),
- analyzing (screening) interval samples for VOCs with 24-hour turnaround (samples showing VOCs would be submitted to a CLP lab for confirmation analysis with duplicate samples submitted as required),
- using screening data and core information, identify the interval to be screened (use 5-foot stainless steel screen to isolate the specific interval of interest),
- complete and thoroughly develop the monitoring well; and
- survey the well elevation and location, and allow to stabilize before collecting representative groundwater samples.

A water table well should be constructed in close proximity to the monitoring well to provide information on vertical gradients and localized water table elevations.


Following the above steps will not assure interception of a fractured zone that is a main conduit of contamination. However, such an approach will significantly increase the probability of intercepting such a zone and will provide valuable information on background groundwater quality with depth.

Should you have any questions or comments, please contact us at (708) 691-5000.

Sincerely,

WARZYN ENGINEERING INC.


James A. Hill
Project Manager


Gary E. Parker, P.E.
Manager, Hazardous Waste Unit

cc: J. Holmstrom
R. Hall

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